

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF NEW YORK

NATIONAL RIFLE ASSOCIATION OF AMERICA,

Plaintiff,

v.

ANDREW CUOMO, both individually and in his  
official capacity; MARIA T. VULLO, both  
individually and in her official capacity; and  
THE NEW YORK STATE DEPARTMENT OF  
FINANCIAL SERVICES,

Defendants.

Case No. 18 Civ. 566 (TJM)(CFH)

**DEFENDANT MARIA T. VULLO'S  
MOTION TO FILE OPPOSITION UNDER SEAL**

Pursuant to Local Civil Rule 83.13, Defendant Maria T. Vullo respectfully moves this Court to grant her leave to file an unredacted version of her Opposition to Plaintiff's Motion to Amend under seal. Only two footnotes are redacted from the publicly-filed version.<sup>1</sup>

On December 20, 2019, the NRA filed a Motion to Amend seeking leave from this Court to file a Second Amended Complaint in order to seek to re-plead claims against Defendant Vullo that had previously been dismissed. Plaintiff attached to its motion a proposed Second Amended Complaint and Sealed Exhibits A-D. Pursuant to the provisions of the Protective Order and Addendum, Plaintiff sought leave of the Court to file the proposed Second Amended Complaint and Exhibits A-D under seal. The Court has not issued a ruling on Plaintiff's motion.

Footnotes one of Defendant Vullo's Opposition to Plaintiff's Motion to Amend describe the contents of Sealed Exhibits B-D, documents the NRA filed under seal and are currently the subject of its pending motion. Footnote three cites portions of the proposed

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<sup>1</sup> The pages of Defendant Vullo's Opposition to Plaintiff's Motion to Amend that contain the redacted footnotes are attached hereto as Exhibit A.

Second Amended Complaint that were filed under seal and rely on to such sealed exhibits. The NRA obtained these exhibits from Lloyd's, which marked them Confidential pursuant to an Addendum to the Protective Order, as described in the NRA's motion to file under seal. *See* Dkt. 153. Ms. Vullo is not a signatory to that Addendum, but in an abundance of caution, because those documents are the subject of the NRA's pending motion, Defendant Vullo now seeks an order from this Court permitting her to file under seal a portion of her Opposition to Plaintiff's Motion to Amend in which she cites certain content in Sealed Exhibits B-D and portions of the proposed Second Amended Complaint that the NRA filed under seal.

Accordingly, Defendant Vullo requests that this Court grant her leave to file the unredacted opposition brief under seal for substantially the same reasons that Plaintiff set forth in its Motion to File Documents Under Seal.

Dated: New York, New York  
January 27, 2020

Respectfully submitted,

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